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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

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11 A.J.P. and A.M.P., minors, by and
12 through their guardian *ad litem* Cynthia
13 Nunez, individually and as successor in
interest to Albert Perez, deceased; and
PATRICIA RUIZ, individually,

14 Plaintiffs,

15 vs.

16 COUNTY OF SAN BERNARDINO;
17 CORY MCCARTHY; ANDREW
POLLOCK; DAVID MOORE; and
CHRISTINA OLIVAS,

18 Defendants.

Case No. 5:22-cv-01291-SSS-SHK
Hon. Sunshine S. Sykes

**DECLARATION OF MELISSA
BALDWIN IN SUPPORT OF
PLAINTIFFS' UNOPPOSED *EX*
PARTE APPLICATION FOR
APPROVAL OF COMPROMISE OF
THE CLAIMS OF MINOR
PLAINTIFFS A.J.P. AND A.M.P.**

DECLARATION OF MELISSA BALDWIN

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2 1. I am a competent adult. I have personal knowledge of the matters
3 stated herein and would and could testify competently thereto if called. I make this
4 declaration in support of Plaintiffs A.J.P. and A.M.P.'s *ex parte* application for
5 approval of the compromise of the claims of minor Plaintiffs A.J.P. and A.M.P.'s by
6 and through their guardian *ad litem*, Cynthia Nunez, individually and as successors
7 in interest to Albert Perez, deceased.

8 2. I am the Owner and Structured Settlement Consultant of Baldwin
9 Settlements, with offices located at 24265 Juanita Drive, Laguna Niguel, CA 92677
10 and 1 Sansome St., 35th Flr., San Francisco, CA 94104. I am a licensed annuity and
11 life agent specializing exclusively in the creation, establishment and placement of
12 Structured Settlement Annuities for minors and adults and have been in this capacity
13 on a continuous basis since 2006.

14 3. I was brought into this case for my expertise as a Structure Consultant,
15 to compose, place and secure structured annuities for the benefit of the minor
16 Plaintiffs A.J.P and A.M.P. The final annuity payment plan and interest rates were
17 locked in by my office with Metropolitan Life Insurance Company, with a funding
18 deadline of **September 10, 2024**.

19 4. In order for the Defendant to issue payments they must be in receipt of
20 the signed Order Approving Minors Compromise within 30 days prior to the
21 funding deadline, approval on or before August 10, 2024.

22 5. I strongly implore the Court to review this application on an Ex Parte
23 basis and provide approval as soon as possible. If review of the Minor Compromise
24 is delayed, thereby exceeding the funding deadline of September 10, 2024, the rates
25 and annuity payments will expire. No rate extensions are possible and the delay in
26 funding will negatively affect the Minors payments. It would decrease the interest
27 rates, lessen the annuity payments, and decrease of guaranteed return of the
28 structured annuity benefits to the Minors as rates have changed since originally

1 locked in and secured.

2 I declare under penalty of perjury of the laws of the United States of America
3 that the foregoing is true and correct, and that this declaration was executed this 17th
4 day of July 2024, at Laguna Hills, California.

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9 Melissa Baldwin

10 CA License #
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